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ELLYN S. GAROFALO

August 5, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Blake Lively v. Wayfarer Studios LLC, et al.*, Case No. 1:24-cv-10049-LJL

Dear Judge Liman:

Defendants Wayfarer Studios LLC, It Ends With Us Movie LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”) respectfully move the Court on an expedited basis for an order modifying the Court’s Case Management Plan and Scheduling Orders (Dkt. 58, 425). Specifically, the Wayfarer Parties seek an extension of the deadline to file their opposition to Plaintiff Blake Lively’s (“Lively”) Omnibus Motion to Compel the Wayfarer Parties’ Compliance with Discovery Obligations (Dkt. 552) (the “Motion”) from August 6, 2025, to August 11, 2025.¹

There is good cause for this request. At 10:45 p.m. EST on August 4, 2025, Lively filed and served an “Omnibus Motion to Compel” based on alleged deficiencies in the Wayfarer Parties’ document production. The Motion is comprised of a 25-page memorandum and 62 separate exhibits totaling over 2,000 pages. Given its size, the transmission was not completed until 1:09 a.m. EST on August 5, leaving the Wayfarer Parties less than 48 hours to respond. (Dkt. 552-554). The Motion includes a number of new arguments that were not raised in Lively’s meet and confer letters and thus were not anticipated by the Wayfarer Parties.

On August 4, the parties stipulated to and moved for a short continuance of the deadline for a motion to compel from August 1 to August 4, 2025, with the Wayfarer Parties’ response due on August 6, 2025. (Dkt. 548). The Court granted the motion. (Dkt. 549). In entering into the stipulation, the Wayfarer Parties anticipated letter motions -- not a more than 2,000-page filing. Pursuant to the stipulation, the Wayfarer Parties’ response is due by August 6. The short window for a response imposes an unnecessary burden on counsel and, most importantly, threatens to prejudice the Wayfarer Parties by denying them adequate time to review and respond to Lively’s massive filing.

¹ The Wayfarer Parties’ counsel sought Lively’s consent to this request via email to her counsel. Lively’s counsel indicated that Lively would consent to an extension until Friday, August 8, 2025, which is 4 days after service of the Motion rather than the 7 days set forth in Local Civil Rule 6.1(a).

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For good cause shown, and for the reasons set forth above, the Wayfarer Parties respectfully request an extension of the deadline to file their response to August 11, 2025, seven days after service of the moving papers, which is the ordinary deadline applicable to noticed discovery motions. *See* L.R. 6.1(a). The only extension previously sought by the parties was the two-day stipulated extension referenced above. We thank the Court for its prompt attention to this matter.

Respectfully Submitted,

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/s/ Ellyn S. Garofalo

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